COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

Applicant's Name: DART CONTAINER CORP OF CALIFORNIA

Facility ID: 3721

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CORONA, CALIFORNIA 92880-1704

Equipment Location: SAME

APPLICATION NO. 493881:

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

BACKGROUND

Dart Container Corporation of California (Dart Container) manufactures food serving polystyrene products in Corona, California. This facility manufactures food serving polystyrene products, which indicated as follows:

1. Expanded Poly-Styrene (EPS) foam cups
2. Extruded Poly-Styrene (XPS) foam, or called Direct Injection (DI) foam products such as plates, bowls and trays.
3. Transparent Oriented Poly-Styrene (OPS) plastic containers such as cups, plates, lids etc.
4. Opaque High Impact Poly-Styrene (HIPS) plastic lids

Minor VOC emissions are expected from OPS and HIPS manufacturing processes. The VOC emissions from the EPS cup-molding operations are controlled by the burners of four boilers. The VOC emissions from DI foam product manufacturing process are controlled by the Regenerative Thermal Oxidizer (RTO).

Dart Container operates under the Regional Clean Air Incentive Market (RECLAIM) program. Dart Container submitted a Title V permit renewal application (No. 448877) on September 21, 2005. Pursuant to the requirements specified in 40 CFR Part 64 – Compliance Assurance Monitoring, a facility is required to submit a Compliance Assurance Monitoring (CAM) plan as a part of the Title V Renewal application. As a result, Dart Container submitted this CAM plan application (Application No. 493881) to comply with 40 CFR Part 64 requirements.

EVALUATION

The RTO (Device No. C224) is used to control the VOC emissions from the DI foam manufacturing system at this facility. The operating temperature of the RTO will be maintained at a minimum of 1,450

^{0}F. This facility operates and maintains a temperature measuring and recording system for the oxidizer to continuously measure and record the combustion chamber temperature pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such a system is expected to have an accuracy of within 1% of the temperature being monitored and will be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications.

The four boiler/afterburners (Device Nos. D180, D181, D182 and D254) are used to control the VOC emissions from the EPS foam manufacturing system at this facility. The operating temperatures of the four boiler/afterburners will be maintained at a minimum of 1,450 ^{0}F. This facility operates and maintains a temperature measuring and recording system for each boiler/afterburner to continuously measure and record the combustion chamber temperature pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such a system is expected to have an accuracy of within 1% of the temperature being monitored and will be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications.

Pursuant to 40 CFR Part 64, a deviation has been defined as when a combustion chamber temperature of less than 1,450 ^{0}F occurs during normal operation of the equipment it serves. The operator is required to review the records of the combustion chamber temperature on a daily basis to determine if a deviation occurs or to install an alarm system to alert the operator when a deviation occurs. Whenever a deviation occurs, the operator is required to inspect this equipment to identify the cause of such a deviation, take immediate corrective action to maintain the combustion chamber temperature at or above 1,450 ^{0}F, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

The operator is required to report all deviations to the AQMD pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of their Title V permit. The monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of their Title V permit. In addition, the operator is required to submit an application with a Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of their Title V permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

As a part of the CAM plan, the operator is required to inspect and maintain all components of the RTO on an annual basis in accordance with the manufacturer's specifications. The operator is also required to keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable CAM requirements specified in 40 CFR Part 64.9 for a minimum of five years.

RECOMMENDATION

This facility is expected to comply with all requirements specified in 40 CFR Part 64. An appropriate permit condition (Condition No. E193.1) will be imposed in Section H of the Initial Title V permit for the RTO to implement the above-described CAM requirements. In addition, similar permit conditions

(Condition No. C8.1) in Section H of the original RECLAIM facility permit will be removed. Approval for the CAM plan application is therefore recommended.

Modifications are shown in bold italic, original in strike-though.

MODIFICATION OF FACILITY PERMIT TO OPERATE (FACILITY ID: 3721) BY THE REMOVAL OF:

~~**C8.1 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, is not less than 1450 +/- 3 Deg F.**~~

~~**To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the combustion chamber.**~~

~~**The operator shall install also and maintain a device to continuously record the parameter being measured.**~~

~~**[Devices subject to this condition: D180, D181, D182, C224, D254]**~~

~~**E73.1 Notwithstanding the requirements of Section E conditions, the operator shall use the afterburner if all of the following requirement(s) are met:**~~

~~**If only afterburner is preheated to 1400 F or higher.**~~

~~**[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]**~~

~~**[Devices subject to this condition: C224]**~~

K48.1 The operator shall maintain records in a manner approved by the District, to demonstrate compliance with the following condition numbers.

~~**Condition no. 8-1**~~

~~**Condition no. 73-1**~~

Condition no. ***B***59-1

[**RULE 1303(a)(1)-BACT, 5-10-1996;** RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: C224]

AND BY THE ADDITION OF:

E193.1 The operator shall operate and maintain this equipment according to the following requirements:

The combustion chamber temperature shall be maintained at a minimum of 1,450 degrees Fahrenheit whenever the equipment it serves is in operation.

The operator shall operate and maintain a temperature measuring and recording system to continuously measure and record the combustion chamber temperature pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such a system shall have an accuracy of within plus or minus 1% of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications using an applicable AQMD or EPA approved method.

For the purpose of this condition, a deviation shall be defined as when a combustion chamber temperature of less than 1,450 degrees Fahrenheit occurs during normal operation of the equipment it serves. The operator shall review the records of the combustion chamber temperature on a daily basis to determine if a deviation occurs or shall install an alarm system to alert the operator when a deviation occurs.

Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective action to maintain the combustion chamber temperature at or above 1,450 degrees Fahrenheit, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

All deviations shall be reported to the AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit. The semi-annual monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of this permit.

The operator shall submit an application with an Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

The operator shall keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; 40 CFR Part 64, 10-22-1997]

[Devices subject to this condition: D180, D181, D182, C224, D254]